

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

WILLIAM KIRKLAND
Compton Road #4
Cincinnati, Ohio 45203

Case No. C-1-02-364 1335

(Judge) Weber

Magistrate Sherman

Plaintiff,

V.

**MOTION TO FILE
(OUT OF TIME)
PROPOSED AMENDED
COMPLAINT**

CHARLIE LUKEN
Mayor, City of Cincinnati
Individual and official capacity
801 Plum Street
Cincinnati, Ohio 45202
Defendant,

and

ALICIA REECE
Vice Mayor, City of Cincinnati
Individual and official capacity
801 Plum Street
Cincinnati, Ohio 45202
Defendant

and

THOMAS STREICHER, Chief of Police
Individual and official capacity
City Solicitor, City Hall
801 Plum Street
Cincinnati, Ohio 45202
Defendant

and

Sgt. EMMETT GLADDEN (S085)
Individual and official capacity
City Solicitor, City Hall
801 Plum Street
Cincinnati, Ohio 45202
Defendant

and

FILED
KENNETH J. MURPHY
CLERK
03 NOV -5 PM 5:00
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
CINCINNATI


Police Officer Mark E. Sneed (P633)
Individual and official capacity
City Solicitor, City Hall
801 Plum Street
Cincinnati, Ohio 45202
Defendant
and

City of Cincinnati
City Hall
801 Plum Street
Cincinnati, Ohio 45201
Defendant

and
Terrence Cosgrove
Assistant City Solicitor
Individual and official capacity
Serve City Solicitor, City Hall
801 Plum Street
Cincinnati, Ohio 45202

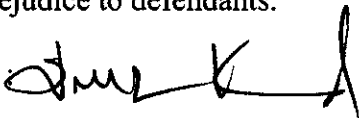
and
Fay Dupris
Former Cincinnati City Solicitor
Individual and official capacity
Serve City Solicitor
801 Plum Street
Cincinnati, Ohio 45202

Now Comes Plaintiff, William Kirkland, Pro Se, seeking leave of
this honorable Court to file an Amended Complaint out of time, and hereby
submits the proposed Amended Complaint attached.

Respectfully Submitted : 
WilliamKirkland
1335 Compton Road #4
Cincinnati, Ohio 452
513.238.3651 (c)
e-mail: thehonorablewilliamkirkland@hotmail.com

MEMORANDUM

This case was originally filed May 23, 2003. A Calendar Order was filed designating July 31, 2003 as the deadline for filing an amended complaint, and adding parties. On July 31, 2003, and September 3, 2003 Plaintiff timely sought, unopposed, leave of Court for an extension of time to file an amended complaint. Plaintiff has Supplemental Complaint allegations he wishes to file under separate cover as a result of new retaliatory criminal charges levied against plaintiff in continued and ongoing violation of plaintiff's 1st, and 14th amended rights. In addition plaintiff was rear ended in a moving car accident on North interstate 75 on the evening of October 5, 2003 and has been experiencing distracting ,and discomfoting headaches, and back pain since that time. Plaintiff's amended complaint was under construction and is complete at this time and submitted attached. There is no prejudice to defendants.

Respectfully Submitted: 
WilliamKirkland
1335 Compton Road #4
Cincinnati, Ohio 45231
513.238.3651 (c)
e-mail: thehonorablewilliamkirkland@hotmail.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion To File Out Of time was mailed by regular U.S. Mail or hand delivered to Attorney Thomas Harris at 801 Plum Street, City Hall, Cincinnati, Ohio 45202 this ~~29th~~ day of ~~October~~ 2003.

Respectfully Submitted :
WilliamKirkland
1335 Compton Road #4
Cincinnati, Ohio 45231

5 day November 2003
